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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

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14 LETICIA RODRIGUEZ,

15 Plaintiff(s),

16 vs.

17
18 NATIONAL CONSUMER TELECOM &
19 UTILITIES EXCHANGE; COX
20 COMMUNICATIONS,

21 Defendant(s).

22 Case No.: 2:21-cv-01407-JCM-BNW

23
24 **JOINT MOTION AND
STIPULATION FOR EXTENSION
OF TIME FOR PLAINTIFF TO
FILE RESPONSE TO COX
COMMUNICATION'S MOTION
TO DISMISS AND COMPEL
ARBITRATION (ECF #21)**

25 **(First Request)**

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27 Leticia Rodriguez ("Plaintiff"), by and through her counsel, together with Defendant Cox
28 Communication ("Cox"), by and through its counsel, collectively the "Parties", and hereby jointly move,
stipulate and agree to extend the time for Plaintiff to respond to Defendant Cox's Motion to Dismiss and

1 Compel Arbitration (“Motion to Dismiss”), filed on November 8, 2021 as ECF #21, for 3-weeks until
2 December 13, 2021 and show the Court as follows:

3 Plaintiff’s current deadline to respond to the Motion to Dismiss is November 22, 2021. The
4 reason for the extension is because Plaintiff needs additional time to examine and evaluate the arguments,
5 evidence and legal analysis set forth in the Motion to Dismiss and respond to the arguments asserted
6 therein. Additionally, Plaintiff and Cox have engaged in settlement discussions and possible resolution
7 of the Motion to Dismiss and believes there is a fair opportunity that the Parties can resolve this matter
8 without incurring additional judicial resources and expenses of the Parties.

9
10 This is Plaintiff’s first request for an extension and Defendant Cox has agreed to the extension of
11 time and will not be prejudiced by the extension. Likewise, the extension of time does not affect nor will
12 it prejudice Defendant National Consumer Telecom & Utilities Exchange (“NCTUE”).

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14 Stipulated and Agreed: November 19, 2021.

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16 /s/ Shawn W. Miller
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22 /s/ Michael N. Feder
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25 **ORDER GRANTING EXTENSION OF TIME**

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27 IT IS SO ORDERED.

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30 UNITED STATES DISTRICT JUDGE

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32 Dated: November 22, 2021
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